

# Conduct of Engineering Request for Variance or Alternate Method

To display the VAR Request Metadata pane for this document, click File > Info > Properties > Show Document Panel.

#### 1.0 General

1.1 Document Number: VAR-10122	1.2 Revision: 0			
1.3 Brief Descriptive Title: Receipt Inspection Reduction in ML-4 Specifications				
1.4 Affected Program: Engineering Standards	1.5 Request Type: Variance			
1.6a Affected Tech Area 99	1.6b Affected Buildings Sitewide			
1.7 Requestor: Oruch, Tobin H Organization: ES-DO				
Revision History     Revision Number Changes and Comments     R0 Initial issue.				

# 2.0 Affected Conduct of Engineering Program/Documents

2.1 Affected "P" Document:P342 Engineering Standards

2.2 Subordinate or related document(s) [AP, master spec, LANL ESM chapter & section; or code, Order, standard, etc.]:

If against the P document itself, revision (or **N/A**):

N/A

Document Title/No.: LANL Master Specification Sections that require receipt inspection for ML-4 SSCs. Possibly including but not limited to 26 2413 r3 Switchboards, 26 2416 r2 Panelboards, 26 2419 Motor Control Centers r3, and 26 2816 r3 Enclosed Switches.

Revision various

- 2.3 Section/Paragraph: Various, usually in PART 1.
- 2.4 Specific Requirement(s) as Written in the Document(s):

The following is an example of a receipt inspection requirement in an ML-4 LMS:

- A. Perform receipt inspection of [item] in accordance with LANL P 840-1 *Procurement Quality*. For each panelboard complete a LANL Form 838c, *Quality Assurance Supplement*, specifically using clause QC-27 Suspect/Counterfeit Items. Examine each [snip] to verify that it is genuine, new, and unaltered. Report any suspect/counterfeit [snip] to the LANL Subcontract Technical Representative and the LANL Suspect/Counterfeit Item Coordinator (SCIC). Indicators of suspect/counterfeit [items] include the following:
  - 1. Missing date code.
  - 2. Date code is older than two years, or style is no longer manufactured.

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Form Rev 1a: Template file: 2137\_PROD\_v1.docx [01/23/17]

- 3. Factory seals broken or removed.
- 4. Mislabeled or over-labeled to change size or type.
- 5. Non-English text in labels.
- 6. Missing or suspect UL sticker; CE is not an acceptable NRTL.
- 7. Low quality labeling and/or misspelled words on labels.
- 8. Outdated manufacturer's label or logo, or refurbisher's name on label.
- 9. Not received in original, sealed packaging.
- 10. Screwdriver or wrench marks on terminals.
- 11. Handle modified to change ampere rating.
- 12. Contradicting amperage, voltage, or interrupting ratings.

## 2.5 Contractual, preference, or other basis for requirement:

POC preference. There are contractual mandates for minimizing suspect/counterfeit, but LANL processes for same do not depend on invoking receipt inspection in specifications; see additional discussion below.

2.6 Type of VAR from ESM Chap 1, Z10 [Applies only to	2.7 Discipline
standards variances)	Electrical
Type 1	

# 3.0 Request Information & Comments

3.1 NCR required (work has occurred)? No	
If Yes, NCR Number: Enter text.	
3.2 System/Component Affected	3.3 Highest ML Level
OpSystem Acronym & Name ED_Electrical Distribution	
System Number or Name [Select SystemNumberOrName]	ML-4

### 3.4 Proposal with Justification/Compensatory Measures:

#### Proposal

When a LANL Master Specification (LMS) both (1) contains a requirement for receipt inspection (RI) and (2) is to be used for an ML-4 SSC work result, the RI requirement should be considered Not Applicable. As such, when editing the LMS template for a project, the Design Agency must delete the RI requirements unless the rationale for retaining is documented in the project files.

As is standard practice, this sitewide VAR will be posted against the affected documents until such time that they are revised.

Projects underway may elect to utilize this VAR by revising their their ML-4 spec sections to eliminate ML-4 RI as desired.

# **Justification**

ML-4 RI can be costly (inspection itself, plus cost of processing an NCR if problems are found). LANL P840-1

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Quality Assurance for Procurements already requires RI for those safety affecting commodities (including ML-4) that are highly prone to counterfeiting. These include standalone circuit breakers, fasteners, and hoisting/lifting/rigging equipment.

Because most/all of the LMS currently requiring ML-4 RI are electrical, the POC for them was consulted and concurs with this VAR.

3.5 Attachments

Document Title or Description Enter text...

3.6a Project ID

3.6b: Project Name

N/A

N/A

3.7 Duration:

3.8a Finite Period Start Date: Click to enter a date.

3.8b End Date:

Click to enter a date

3.8c When finite life, provide the PFITS number for tracking removal/correction: [PFITSNum]

3.9 USQD/USID required (Nuclear, High/Mod Hazard)? No

If Yes, USQD/USID Number Click here to enter text.

3.10 QA Review for process change matters potentially affecting LANL's NQA-1 implementation

Is a QPA Determination required?: No If **Yes**, then: Choose an item.

QPA Comments: Enter text...

3.11 POC Determination: Accept

POC Comments: Enter text..

Lifetime

3.12 Management Program Owner's (SMPO) Approval for P341 and APs; P342, ESM, ML-1 and -2, and Contract

Matters; and P343

SMPO Determination: N/A - Type 1 Variance

Comments: Enter text...

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# 4.0 Participant Signatures NOTE: DO NOT ADD NAMES FROM WITHIN WORD! Save and close the form first, then do 1-4 below: 1. From the SharePoint library, select the document, then click the ellipsis (...) in the second column; a small dialog appears 2. In the small dialog click the ellipsis again

3. Click **Edit Properties** and check out the document if prompted toEnter names using the controls provided, then **Save** 

3. Click <b>Edit Properties</b> and check out the document if pro		
4.1 POC (Management Program Owner's Representative):	Organization	Signature
representative).	ES-DO	
Orugh Tahin H		
Oruch, Tobin H		
4.2 Facility Design Authority Representative	Organization	Signature
	Enter text	
[FDARName]		
FDAR signature not required		
4.3 LANL Owning Manager (FOD or R&D/Program)	Organization	Signature
ind in the interest of the int	Enter text	2.3
[FODorPrgmMgrName]		
FOD or Program Manager signature not required		
4.4 Ovelik, Daviewska News		
4.4 Quality Reviewer's Name:	Organization	Signature
	Enter text.	
[QPAName]		
QPA review/signature not required ⊠		
- Control of States and States an		
4.5. Cofety on Consuity Management Browns	0	Cinn of the
4.5 Safety or Security Management Program Owner's Approval for P341 and APs; P342, ESM	Organization	Signature
and Contract Matters; and P343	ES-DO	
and contract matters, and 1 one		
CMDO signatura natura i 1/T		
SMPO signature not required (Type 1 variance) ⊠		
4.6 Additional Signer 1	Organization	Signature
[AdditionalSigner1]	Enter text.	
Role: Enter text.		
	1	

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4.7 Additional Signer 2	Organization	Signature
[AdditionalSigner2]	Enter text.	
Role: Enter text.		
4.8 CoE Administrator Signature	Signature	
Salazar-Barnes, Christina L		
NOTE: The CoE Admin is always the last signature placed on this document. The date of that signing is the date of this document.		